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September 30, 2005

Marlene H. Dortch, Secretary Federal Communications Commission Room TW-B204 445 12th Street, SW Washington DC 20554

RE: Joint Application of IBFA Acquisition Company, LLC d/b/a Farm Bureau Connection and American Farm Bureau, Inc. for Authority pursuant to Section 214 of the Communications Act of 1934, as Amended, to Transfer the Local and Interexchange Customer Base of an Authorized Domestic Carrier

Dear Ms. Dortch:

In accordance with the request of Commission staff member Adam Kirschenbaum, we provide the following additional statements:

- 1. IBFA Acquisition Company, LLC d/b/a Farm Bureau Connection ("IBFA") is not providing telecommunications services in any jurisdiction.
- 2. Applicants submit that the proposed transaction would result in IBFA's market share in the local exchange market of substantially less than ten percent. Neither Applicant is dominant with respect to any service. Therefore, this Application presumptively qualifies for streamlined processing pursuant to Section 63.03(b)(2)(i) of the Commission's rules.

If you have further questions or concerns, please contact the undersigned.

Very truly yours,

ZARLY, JENNON, CROCKER & BARTOSIEWICZ, P.L.C.

Ratrick D. Crocker

PD¢/bp/